

Appl. No. 09/328,667

Attorney Docket No.: 113394

**REMARKS**

Claims 1-5, 7-15, 17-25 and 27-30 remain pending in this application.

**35 U.S.C. § 102 (e) Rejection of Claims 1-7, 9-17, 29 and 30**

The examiner has rejected claims 1-7, 9-17, 29 and 30 under 35 U.S.C. § 102 (e) as being anticipated by U.S. Patent No. 6,374,302 B1 (Galasso). The examiner contends that Galasso discloses all of the limitations of the rejected claims.

Claims 6, 16 and 26 have been canceled. These claims are deemed not necessary in view of recitations in their respective parent claims.

Applicants respectfully traverse the rejection of the others of these claims.

In applying applicant's claims to Galasso, the Office action associates applicant's recited gatekeepers with Galasso's gatekeepers as follows:

Applicant	Galasso
First Gatekeeper	US Gatekeeper 550
Second Gatekeeper	Europe Gatekeeper 560
Third Gatekeeper	Zone Gatekeeper within e.g. zone 510
Intermediate Gatekeeper	Global Gatekeeper 570

Applicant and the examiner agree that Galasso's system as disclosed does not meet all of the limitations of applicant's claims. This is because Galasso's zone gatekeeper and US gatekeeper are at different hierarchical levels whereas applicant's claims require that the first and third gatekeepers "are of a same hierarchical level and located in a same domain."

The Office action asserts, however, that it would have been obvious to a person of ordinary skill to put Galasso's first and third gatekeepers at the same hierarchical level in order to scale the administrative domain coverage, thereby arguably meeting the language of applicant's claims.

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It is respectfully submitted, however, that such a modification to Galasso is directly contrary to the very core of Galasso's teachings and thus it would not have been obvious to the person of ordinary skill to make the modification suggested in the Office action.

Scaling the administrative domain coverage in the manner suggested in the Office action would mean that the zone gatekeeper would be brought up to be at the same (higher) hierarchical level as the US gatekeeper, so that the zone gatekeeper would be doing the same function as the US gatekeeper. That is what is means, by definition, for two entities to be at the same hierarchical level. That function is to receive requests from the various zones lower in the hierarchy and to obtain addresses or other information from other zones responsive to the requests. In effect, the US administrative domain would then have two gatekeepers each serving (presumably) different ones of the zones. This is what applicant believes was intended by the statement in the Office action in its reference to "scaling the administrative domain coverage." Indeed, applicant will assume for purposes of argument that it might be obvious to provide the US gatekeeper with such a "helper" with each of them supporting different ones of the zones.

However, applicants claims would not read on such a modified version of Galasso because then the two gatekeepers would not be requesting or delivering information to one another but only to the gatekeepers in the zones that they are associated with. By contrast, the claims specifically require that the information requested of the first gatekeeper is sent to the third gatekeeper.

In view of the foregoing, it is respectfully submitted that there is no obvious modification of Galasso on which applicant's claims would read.

### **35 U.S.C. § 103 (a) Rejection of Claims 8, 18 and 28**

The examiner has rejected claims 8, 18 and 28 under 35 U.S.C. § 103 (a) as being unpatentable over Galasso in view of U.S. Patent No. 6,426,945 B1 (Sengodan).

Since each of those claims depends from one of applicant's independent claims 1, 11 and 21, it is submitted that each of these claims is allowable for at least the reasons set forth hereinabove.

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**Conclusion**

In view of the foregoing, it is respectfully submitted that the claims are in condition for allowance and reconsideration is requested. If the examiner believes that any issues remain unresolved, a telephone call to the undersigned would be welcome.

Respectfully,  
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